



Since 1957

## KARNATAKA STATE CHARTERED ACCOUNTANTS ASSOCIATION (R.)



CA Pramod Srihari  
President  
CA Vijaykumar M Patel  
Secretary

Date: Monday, June 12, 2023

To,  
Whosoever it may concern,  
The Department of Legal Metrology  
Government of Karnataka

Respected Sir/Ma'am,

**SUBJECT: Representation on challenges faced in obtaining a Packing Registration from the Department of Legal Metrology**

The Karnataka State Chartered Accountants Association (R) (in short 'KSCAA') is an association of Chartered Accountants, registered under the Karnataka Societies Registration Act, in the year 1957. In the past, we have written to various authorities many times populating various issues, challenges and hardships being faced by the business community, while also suggesting possible solutions to the same.

The Prime Minister, Shri Narendra Modi, said<sup>1</sup> that it is necessary to reduce human intervention in processes, and increase the use of modern and digital technologies. He said that a work culture based on this, will further promote policy driven governance.

Through this representation, we would like to bring to your kind notice, a few practical issues being faced by the community. These difficulties can have a significant impact on an individual's or organization's ability to operate and achieve their goals. It is important to acknowledge these difficulties and work towards finding a resolution. This could include simplifying the process, grant of instant registration, reducing wait times,

<sup>1</sup> 19 NOV 2018 8:09PM by PIB Delhi 'PM launches Ease of Doing Business Grand Challenge, addresses cross-section of Industry representatives'



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elimination of human intervention and making it easier to navigate the requirements and procedures. For the issue, challenge or hardship highlighted, we have also suggested solutions.

A person engaging in packaged commodities, amongst others, must also obtain a Packing Registration from the Department of Legal Metrology.

Amongst the basic KYC documents, what is mandatorily required to obtain this registration is also the Goods and Service Tax Registration. This requirement is unreasonable as the Central/State Goods and Service Tax Act, 2017 has given a turnover threshold, only above which the taxpayer is expected to obtain a GST registration.

It is unjust to expect dealers to obtain GST registration just for the purpose of obtaining packing license.

We believe that by addressing these challenges and finding a resolution, we can create a more efficient and effective registration process that benefits everyone. We look forward to working with the relevant authorities to find a solution that addresses the difficulties in obtaining registration.

We are presenting before you the above-enumerated issues, challenges and hardships faced by the taxpayers, trade, industry and professionals due to lack of implementation of the provisions of the law. Wherever required, we have also given recommendations for your kind consideration.



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We the members of Karnataka State Chartered Accountants Association, on behalf of the entire Chartered Accountants fraternity and also on behalf of the trade and industry in the state of Karnataka appeal to your good selves to kindly consider our above recommendations on various issues populated as above. Implementation of the above suggestions will be a major step in the direction of 'Ease of doing business'.

Yours sincerely,

**For Karnataka State Chartered Accountants Association ®**

CA PRAMOD  
SRIHARI  
President

CA VIJAYKUMAR  
M PATEL  
Secretary

CA SIDDESH  
NAGARAJ GADDI  
Chairman  
Representation  
Committee